<u>REMARKS</u>

Drawings 1-3 are objected to as failing to be designated as prior art. Replacement drawing sheets are submitted herewith with a prior art designation.

The title is objected to as being non-descriptive. A replacement title is submitted above.

Claims 14, 15, 18 and 21-25 are rejected under 35 US 103(a) as being unpatentable over US Patent No. 6,795,085 to Doherty et al. (hereinafter Doherty et al) in view of US Patent No. 7,256,795 to Chen (hereinafter Chen).

Claims 14 and 21-25 are independent. Claims 15 and 18 are dependent on claim 14.

This rejection is improper as it fails to present a prima facie case of obviousness. The combination of Doherty et al and Chen does not teach all elements of the claimed invention.

Independent claims 14 and 21-25 all comprise elements wherein a dither pattern in a dither pattern tile comprises pixel elements that are spatially dispersed from pixel values in a dither pattern tile of another color channel. This concept is not taught in the cited prior art.

Claim 14 comprises the element: "designating first pixel values in said first dither pattern tile wherein said first pixel values are spatially dispersed from other pixel values in said first dither pattern tile and said first pixel values *are spatially dispersed from second pixel values in said second dither pattern tile in said second color channel*, wherein said designating is performed by a computing device comprising a processor and a memory."

Claim 21 comprises the element: "a designator for designating pixel values in said dither pattern tiles wherein said designator designates subsequently-designated pixel values, in a first dither pattern tile in a first of said color channels, wherein said subsequently-designated pixel

values are spatially dispersed from previously-designated pixel values in said first dither pattern tile and *wherein said subsequently-designated pixel values are also dispersed from previously-designated pixel values in dither pattern tiles in another of said color channels*, and wherein said designator comprises a processor linked to said memory."

Claim 22 comprises the element: "designating pixel values in said dither pattern tiles wherein *subsequently-designated pixel values are spatially dispersed from previously-designated pixel values in the same dither pattern tile and dither pattern tiles in other color channels*, wherein said designating is performed by a computing device comprising a processor and a memory."

Claim 23 comprises the element: "wherein pixel values in said dither pattern tiles are designated such that pixel values, in a first dither pattern tile in a first of said color channels, are spatially dispersed from other pixel values in said first dither pattern tile and wherein said pixel *values in said first dither pattern tile are also dispersed from pixel values in dither pattern tiles in another of said color channels*."

Claim 24 comprises the element: "designating a *first pixel value at a first point in a first dither pattern tile of a first color channel* of said first temporal frameset, wherein said designating is performed by a computing device comprising a processor and a memory; designating a second pixel value at a second point in a *second dither pattern tile of a second color channel* of said first temporal frameset, wherein said *second point is placed at a location that is dispersed away from at least one pixel value in said first dither pattern tile*, wherein said designating is performed by said computing device."

Claim 25 comprises the element: "designating pixel values at locations in a second dither pattern tile of a second color channel of said first temporal frameset, wherein said locations are

dispersed from locations of other pixel values in said first and second color channels in said first

temporal frameset and said second temporal frameset, wherein said designating is performed by

said computing device."

All these claims clearly and explicitly describe methods and systems wherein dither

pattern pixel values are designated as spatially dispersed from dither pattern pixel values in

another color channel. The prior art does not teach this concept.

Examiner states in the rejection that Doherty et al do not teach dither pattern tile color

channels (p.6, line 4 or rejection). Accordingly, Doherty et al do not teach this concept.

Examiner cites Chen (Fig. 1, Col.4, line 66 to Col. 5, line 14) as teaching this concept. However,

Chen, at this location, simply teaches that his disclosed temporal dithering mode will change the

color of a sequence from frame to frame. Chen does not disclose, at any location, the process or

concept of creating or applying a dither pattern tile with pixel values that are spatially dispersed

from dither pattern pixel values in other color channels. Chen's disclosure of an inherent

temporal color change problem and the known use of color channels makes no reference to the

specific dispersion methods and processes of the presently-claimed invention. Accordingly, this

rejection fails to present a prima facie case of obviousness.

Dependent claims 15 and 18 comprise this element by dependence and are patentable for

the reasons stated above in relation to the independent claims.

Claim 16 is rejected under 35 US 103(a) as being unpatentable over US Patent No.

6,795,085 to Doherty et al. (hereinafter Doherty et al) in view of US Patent No. 7,256,795 to

Chen (hereinafter Chen) and further in view of US Patent No. 4,758,893 to Lippel.

Claim 16 is dependent on claim 14.

This rejection is improper as it fails to present a prima facie case of obviousness. The combination of Doherty et al, Chen and Lippel does not teach all elements of the claimed invention.

Independent claim 14 comprises elements wherein a dither pattern in a dither pattern tile comprises pixel elements that are spatially dispersed from pixel values in a dither pattern tile of another color channel. This concept is not taught in the cited prior art.

Claim 14 comprises the element: "designating first pixel values in said first dither pattern tile wherein said first pixel values are spatially dispersed from other pixel values in said first dither pattern tile and said first pixel values *are spatially dispersed from second pixel values in said second dither pattern tile in said second color channel*, wherein said designating is performed by a computing device comprising a processor and a memory."

This claim clearly and explicitly describes methods and systems wherein dither pattern pixel values are designated as spatially dispersed from dither pattern pixel values in another color channel. The prior art does not teach this concept.

Examiner states in the rejection that Doherty et al do not teach dither pattern tile color channels (p.6, line 4 or rejection). Accordingly, Doherty et al do not teach this concept. Examiner cites Chen (Fig. 1, Col.4, line 66 to Col. 5, line 14) as teaching this concept. However, Chen, at this location, simply teaches that his disclosed temporal dithering mode will change the color of a sequence from frame to frame. Chen does not disclose, at any location, the process or concept of creating or applying a dither pattern tile with pixel values that are spatially dispersed from dither pattern pixel values in other color channels. Chen's disclosure of an inherent temporal color change problem and the known use of color channels makes no reference to the specific dispersion methods and processes of the presently-claimed invention. Similarly, Lippel

does not teach this concept. Lippel is cited for the use of weighted temporal frames, but does not disclose dither pattern pixel values being spatially dispersed from values in another color channel. Accordingly, this rejection fails to present a prima facie case of obviousness.

Claim 17 is rejected under 35 US 103(a) as being unpatentable over US Patent No. 6,795,085 to Doherty et al. (hereinafter Doherty et al) in view of US Patent No. 7,256,795 to Chen (hereinafter Chen) and further in view of US Patent No. 7,110,010 to Masuji.

Claim 17 is dependent on claim 14.

This rejection is improper as it fails to present a prima facie case of obviousness. The combination of Doherty et al, Chen and Masuji does not teach all elements of the claimed invention.

Independent claim 14 comprises elements wherein a dither pattern in a dither pattern tile comprises pixel elements that are spatially dispersed from pixel values in a dither pattern tile of another color channel. This concept is not taught in the cited prior art.

Claim 14 comprises the element: "designating first pixel values in said first dither pattern tile wherein said first pixel values are spatially dispersed from other pixel values in said first dither pattern tile and said first pixel values *are spatially dispersed from second pixel values in said second dither pattern tile in said second color channel*, wherein said designating is performed by a computing device comprising a processor and a memory."

This claim clearly and explicitly describes methods and systems wherein dither pattern pixel values are designated as spatially dispersed from dither pattern pixel values in another color channel. The prior art does not teach this concept.

Examiner states in the rejection that Doherty et al do not teach dither pattern tile color channels (p.6, line 4 or rejection). Accordingly, Doherty et al do not teach this concept. Examiner cites Chen (Fig. 1, Col.4, line 66 to Col. 5, line 14) as teaching this concept. However, Chen, at this location, simply teaches that his disclosed temporal dithering mode will change the color of a sequence from frame to frame. Chen does not disclose, at any location, the process or concept of creating or applying a dither pattern tile with pixel values that are spatially dispersed from dither pattern pixel values in other color channels. Chen's disclosure of an inherent temporal color change problem and the known use of color channels makes no reference to the specific dispersion methods and processes of the presently-claimed invention. Similarly, Masuji does not teach this concept. Masuji is cited for disclosing dither coefficient weighting, but does not disclose dither pattern pixel values being spatially dispersed from values in another color channel. Furthermore, it should be noted that Masuji discloses weighting of dither coefficients based on gradation levels of the video signal. Claim 17 claims weighting of dispersion values for differing color channels, which is not disclosed in Masuji. Accordingly, this rejection fails to present a prima facie case of obviousness.

Claim 20 is allowable subject matter.

Applicant respectfully requests that the examiner reconsider this rejection in light of the

above disclosure and statements.

Respectfully submitted,

 /Scott C. Krieger/
Scott C. Krieger
Reg. No. 42,768
Tel. No.: (360) 931-6406